

1 Todd W. Prall, Esq. (9154)
2 HUTCHISON & STEFFEN, PLLC
3 Peccole Professional Park
4 10080 W. Alta Drive, Suite 200
5 Las Vegas, Nevada 89145
Telephone: (702) 385-2500
Facsimile: (702) 385-2086
tprall@hutchlegal.com

6 *Attorneys for Defendants, Counterclaimant*
7 *and Third-Party Plaintiff*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10

11 ELEVATION HEALTH LLC, a foreign
limited liability company,

12 Plaintiff,

13 vs.

14 AMERICARE, INC., a domestic corporation;
15 MARIO GONZALEZ, individually;
16 JENNIFER GONZALEZ, individually; DOES
I through X; and ROE CORPORATIONS I
through X,

17 Defendants.

18 _____
19 AMERICARE, INC., a domestic corporation;

20 Counter-claimant,

21 vs.

22 ELEVATION HEALTH, LLC, a foreign
limited liability company and DOES 11
through 20,

23 Counter-defendants.

24 _____

25 AMERICARE, INC., a domestic corporation,

26 Third-Party Plaintiff,

27 vs.
28 _____

Case No. 2:22-cv-01590-GMN-NJK

**STIPULATION AND ORDER TO
EXTEND TIME FOR THIRD-PARTY
DEFENDANT GARY ROMANIK TO
RESPOND TO AMERICARE, INC'S
THIRD-PARTY COMPLAINT
(First Request)**

1 GLOBAL HEALTH SUPPLY, LLC, a
2 Nevada limited liability company; JENNIFER
3 PIKE aka “JENNIFER CAPRI”, an individual;
4 ROBERT EKSTEDT, an individual;
CHARLES KASBEE, an individual; SILVER
PEAKS HOLDINGS, LLC, a Wyoming
limited liability company; SGH USA, an
unknown entity; GARY ROMANIK, an
individual and DOES 21 through 30,

6
7 Third-Party Defendants.

8 Third-Party Plaintiff, AMERICARE, INC. (“Americare”) by and through its counsel of
9 record, Todd W. Prall, Esq., and Third-Party Defendant, GARY ROMANIK (“Romanik”), hereby
10 stipulate and agree, pursuant to Federal Rules of Civil Procedure 6(b) and Civil Local Rule IA 6-1,
11 to extend the deadline for Romanik to answer or otherwise respond to Americare’s Third-Party
12 Complaint to January 23, 2023. This is the first stipulation for extension of time for Mr.
13 Romanik to answer or otherwise respond to Americare’s Third-Party Complaint.

14 Good cause exists for this extension given that Mr. Romanik is located in California and is
15 still in the process of finding qualified counsel to represent him in this matter, which has been
16 particularly difficult due to the holiday season. Further, once he finds qualified counsel, counsel will
17 need time to familiarize themselves with this matter and prepare a response to Americare’s Third-
18 Party Complaint.

19 This Stipulation is made in good faith and is not for the purpose of delay.

20 DATED this 4th day of January, 2023

DATED this 4th day of January, 2023

21 HUTCHISON & STEFFEN, PLLC

22 /s/ Todd W. Prall

23 _____
Todd W. Prall (9154)
Peccole Professional Park
10080 W. Alta Drive, Suite 200
Las Vegas, Nevada 89145
tprall@hutchlegal.com

24
25
26
27 Attorneys for Third-Party Claimant
Americare, Inc.

/s/ Gary Romanik

28 _____
Gary Romanik
13600 Marina Pointe Drive, #501
Marina del Rey, CA 90292
GRomanik@twinholdingsla.com

Temporarily Pro Se Third-Party Defendant
IT IS SO ORDERED.
Dated: January 5, 2023